

EPA Comments - Batch of Residential Mitigation Plans - Please submit revised plans by Friday, May 13th

MORASH, MELANIE

Mon 5/9/2016 11:12 AM

To: J. Wesley Hawthorne <hawthornej@locustec.com>;

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Good morning, Wes,

Thank you for submitting this updated batch of residential mitigation plans. Please review the following comments and provide updated mitigation plans by Friday, May 13th:

Mitigation Plan for RES #21

1. Page 7, Post-Mitigation Sampling, Top of Page

Update to include another round of sampling during the second winter of operation.

2. Page 7, Mitigation Termination Criteria

Update with language similar to that in the RES 106 mitigation plan, specifically, that concentrations in the crawlspace will be evaluated within the context of the risk range and the potential for unacceptable concentrations above the long-term screening level in indoor, occupied air, or to that effect.

Mitigation Plan for RES #71/99

1. Page 7, Mitigation Termination Criteria

Update with language similar to that in the RES 106 mitigation plan, specifically, that concentrations in the crawlspace will be evaluated within the context of the risk range and the potential for unacceptable concentrations above the long-term screening level in indoor, occupied air, or to that effect.

Mitigation Plan for RES # 92/93

1. Page 6, Potential Alternatives

Please consider whether the perforated piping should be removed and replaced with soil gas collector (SGC).

2. Page 7, Mitigation Termination Criteria

Update with language similar to that in the RES 106 mitigation plan, specifically, that concentrations in the crawlspace will be evaluated within the context of the risk range and the potential for unacceptable concentrations above the long-term screening level in indoor, occupied air, or to that effect.

Mitigation Plan for RES # 100

1. Page 2, SMDS Description, First paragraph

The text includes a reference to broken asphalt in the crawlspace, and based on this finding there are a number of issues that should be addressed in this section.

The sentence "...care will be needed to ensure that pipe is laid against the soil sufficient to create a vacuum in the underlying soil." is problematic. An SMD system is a sub-membrane depressurization system and therefore, not applying vacuum directly to the soil. There is no reason to core holes in the asphalt, insert pipes into the soil, etc. As long as the membrane is over all of these and the membrane is depressurized all of this text regarding the asphalt doesn't need to be in the plan. A 12 mil membrane is fairly robust, but small sharp rocks within the asphalt can puncture the membrane under the weight of the installers.

Please include text that describes the possibility of damage to the membrane that can be caused by the asphalt. Additionally, a plan to inspect and repair the membrane that lies over the asphalt should be included in this section.

2. Page 2, SMDS Description

There is no explanation of a pressure test procedure in the next paragraph, although it isn't necessary if the references regarding the asphalt installation procedures are removed.

3. Page 7, Mitigation Termination Criteria

Update with language similar to that in the RES 106 mitigation plan, specifically, that concentrations in the crawlspace will be evaluated within the context of the risk range and the potential for unacceptable concentrations above the long-term screening level in indoor, occupied air, or to that effect.

Mitigation Plan for RES105/124/125

1. Page 4, SMDS Specifications, third paragraph (¶), bottom of page –

The text refers to a sampling port being installed above (downstream) of the fan for stack sampling and for vacuum and flow. This port can be used for sampling and potentially flow, but cannot be used to measure vacuum. To measure vacuum, the port will need to be before (upstream) of the fan. Depending on the sampling port location and whether it can be located in a 4-6 foot length of pipe, flow may be variable due to turbulence in the stream.

2. Page 5, Potential Alternatives

Please consider the last sentence and whether the perforated piping should be removed and replaced with a Soil Gas Collector (SGC).

3. Page 6, Post-Mitigation Sampling, Top of Page

Update to include another round of sampling during the second winter of operation.

4. Page 7, Mitigation Termination Criteria

Update with language similar to that in the RES 106 mitigation plan, specifically, that concentrations in the crawlspace will be evaluated within the context of the risk range and the potential for unacceptable concentrations above the long-term screening level in indoor, occupied air, or to that effect.

Regards,

Melanie

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From: J. Wesley Hawthorne <hawthornej@locustec.com>
Sent: Friday, April 29, 2016 2:51 PM
To: MORASH, MELANIE
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Subject: New and revised mitigation plans

Melanie:

Attached are new or revised mitigation plans for the following residences:

RES021
RES071/099
RES092/093
RES100
RES105/124/125

These are the mitigation plans that were waiting on finalization of the RES084/085 plan before being issued or revised. Please let me know if you have any questions.

J. Wesley Hawthorne, PE, PG

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